January 3, 1997

To: Ron Ott
Steve Yaeger

From: Rick Woodard

Subject: Thoughts on the structure of the Component Refinement Report

At your request, I have looked over "Water Quality Example", which is **Attachment A** to this document. While it is presented logically, it occurs to me that the proposed structure is many layers deep (i.e. objective, sub-objective, sub-sub-objective, etc.), and is likely to be difficult for people to understand. The problem to me is that, conceptually, our work does break down to many sub-levels. In fact, I could suggest that a more complete structure might look something like this:

Goal: Provide good water quality for Environmental Needs
Objective: Provide improved Delta water quality for Environmental needs.
Subobjective: Reduce concentrations of toxic constituents and their bioaccumulation to eliminate their adverse effects on populations of fish an wildlife species.
SubSubObjective: Reduce concentrations of hydrocarbons, heavy metals, and other pollutants in the Bay-Delta system water and sediments.
SubSubSubObjective: Reduce concentrations of hydrocarbons
SubSubSubSubObjective: Reduce concentrations of hydrocarbons in water.
SubSubSubSubSubObjective: Reduce concentrations of hydrocarbons in the water of the San Joaquin River
SubSubSubSubSubObjective: Reduce concentrations of hydrocarbons in the water of the Sacramento River

It would not be illogical to subdivide in such a manner, as the actions we wind up taking will be specific to a particular water quality constituent in a particular medium (sediment or water), from a specific source, and at a specific place. The problem, then, is not whether the above represents a logical subdivision, but whether people will be able to understand us. It has been my belief that public understanding of the CALFED process has suffered from our inability to avoid presenting an extremely complicated picture, coupled with overuse of bureaucratic jargon.

Perhaps it is more important to present a clear vision to the public, even at the expense of some accuracy in describing our process and work subdivisions. **Attachment B** is a proposed structure that is intended to focus on conceptual simplicity.

Attachment A

Rick, Does this type of language / objective make sense? Ron

Water Quality Example

Goal: Provide good water quality for all beneficial uses.

Objective: Provide improved Delta water quality for Environmental needs.

Subobjective: Reduce Concentrations of Toxic Constituents and their Bioaccumulation to eliminate their adverse effects on populations of fish and wildlife species.

Sub-subobjective: Reduce the concentrations of hydrocarbons, heavy metals, and other pollutants in Bay-Delta system water and sediments.

Implementation Objective: Decrease the copper concentrations of the in-Delta water column (to less than .01 mg/l) and sediments (to less than 34.0 ppm, dry weight).

Target: Reduce urban and industrial constituent loadings to the Delta by detention and strategic release of 20 to 30 percent of runoff water.

Action: Implement a program to provide incentives to industry and municipalities to build facilities that detain and release the "first flush" flows to better match in river dilution flows.

OR

Target: Reduce tributary and Delta heavy metals loadings by implementation of moderate on-site mine drainage remediation measures.

Action: Extract, treat, and dispose of contaminated sediments that have accumulated in the Spring Creek arm of Keswick Reservoir.

ATTACHMENT B

Woodard 1/3/97

Water Quality Example

Goal: Provide good water quality for all beneficial uses.

Objective: Provide improved Delta water quality for Environmental needs.

Target: Reduce copper concentrations in the Sacramento, San Joaquin and east side tributary streams to less than 0.5 ug/L in the water column.

Purpose: Prevent toxicity due to copper, which is demonstrated to occur to sensitive aquatic life stages when present in concentrations greater than 0.5 ug/L.

Action: Mediate an arrangement with the Sacramento Regional Wastewater Treatment Plant to fund routing of X creek flow around the Y tailing pile associated with Z mine on the upper Sacramento River watershed, in return for not being required to undertake more stringent and costly source pre-treatment programs in the Sacramento Regional service area.

Action: In conjunction with EPA, provide financial incentives for additional remedial measures to bring Penn Mine copper discharges to the Sacramento River below the present regulatory limit of 5.2 ug/L.

Target: Reduce diazinon concentrations in the San Joaquin River system to less than 0.1 ug/L in the water column.

Purpose: Prevent acute aquatic toxicity that has been demonstrated to be associated with the presence of diazinon from dormant insect sprays, especially during high runoff periods, when present in concentrations above 0.1 ug/L in the water column.

Action: In coordination with county Agricultural Commissioners and chemical manufacturers, develop an outreach educational program for applicators, designed to encourage greater reliance on integrated pest management, and greater compliance with pesticide label instructions.

Action: In conjunction with the Central Valley Regional Water Quality Control Board, develop an assessment program to evaluate the success of efforts to control diazinon usage in an environmentally sound manner.

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